

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF WASHINGTON  
UNITED STATES COURTHOUSE  
700 STEWART STREET  
SEATTLE, WASHINGTON 98101

**ROBERT S. LASNIK**  
DISTRICT JUDGE

(206) 370-8810

August 21, 2019

Robert Dean Bohm  
Robert D. Bohm, PLLC  
P.O. Box 25536  
Federal Way, WA 98093

Blake Edward Marks-Dias  
Corr Cronin, LLP  
1001 4<sup>th</sup> Avenue, Suite 3900  
Seattle, WA 98154-1051

**Delivered Via CM/ECF**

RE: Sandra K. Long v. USAA Casualty Insurance Company et al., No.  
2:19-CV-568-RSL  
Stipulated Protective Order

Dear Counsel:

On August 2, 2019, the Court received your “Stipulated Protective Order.” Dkt. #13.

Pursuant to Fed. R. Civ. P. 26(c), protective orders may be entered to protect confidential commercial information and/or to limit the scope of specific disclosures. Such protective orders may issue upon a showing of good cause.

Although parties may agree on confidentiality among themselves, when they request that the Court be involved, the proposed order must be narrowly drawn, identifying both the type of information that is to be protected and, if not obvious, the reason such protection is warranted. The order must also comply with the applicable federal and local procedural rules.

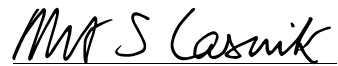
The stipulated protective order submitted in this case is deficient in the following respect:

The description of “confidential material” as including “other confidential or proprietary information of USAA CIC, including information

constituting trade secrets, that may be requested in discovery” is too broad. Any protective order entered by the Court must identify the class or type of documents subject to the order and explain the need for confidentiality if not apparent from the context.

The agreed protective order received by the Court will remain lodged in the file but will not be entered. The parties may resubmit a proposed order if they remedy the deficiencies identified in this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Mr S Lasnik", written over a horizontal line.

Robert S. Lasnik

United States District Judge